

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:

Pro-Mark Services, Inc.,

Bky. Case No. 24-30167
Chapter 7

Debtor.

Erik A. Ahlgren, as Chapter 7 Trustee
of the Bankruptcy Estate of Pro-Mark Services, Inc.,
as Administrator of the Pro-Mark
Services, Inc. Employee Stock Ownership Plan, and
as Trustee of the Pro-Mark Services, Inc.
Employee Stock Ownership Trust,

Plaintiff,

v.

Adversary No. 24-07014

Connie Berg, Kyle Berg, Connie Berg Revocable
Living Trust, Kyle R. Berg Revocable Living Trust,
Chad DuBois, Mandy Grant, and Miguel Paredes,

Defendants.

**STIPULATED MOTION TO EXTEND
RESPONSE PERIOD TO AMENDED COMPLAINT**

1. Plaintiff Erik A. Ahlgren, as Chapter 7 Trustee of the Bankruptcy Estate of Pro-Mark Services, Inc., as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust filed his Adversary Complaint against the Defendants, including Defendant Chad DuBois, and the Court issued a Summons, on August 26, 2024. [ECF Nos. 1, 2.] Answers to the Adversary Complaint were due by September 25, 2024. [ECF No. 2.] Plaintiff filed an Amended Complaint on September 25, 2024, triggering a new response time for Defendant DuBois. [ECF No. 11.]

2. On October 8, 2024, Plaintiff and Defendant DuBois filed a stipulated motion to extend the deadline for Defendant DuBois to file an answer or other response to the Amended Complaint to October 25, 2024 [ECF No. 20] ("Extension Motion"). The parties jointly requested the extension to facilitate settlement discussions. By order dated October 8, 2024 [ECF No. 21], the Court granted the Extension Motion.

3. Plaintiff and Defendant DuBois are continuing to engage in settlement discussions. To facilitate those settlement discussions, Plaintiff and Defendant DuBois hereby move the Court, by stipulation, for an order further extending the deadline for Defendant DuBois to file an answer or other response to the Amended Complaint to November 22, 2024.

Dated: October 24, 2024

/e/ Peter D. Kieselbach
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Dated: October 24, 2024

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